

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

ALEKSANDR J. STOYANOV

Plaintiff

v.

DONALD C. WINTER,
SECRETARY OF THE NAVY, *et al.*,

Defendants

* * * * *

YURI J. STOYANOV

Plaintiff

v.

DONALD C. WINTER,
SECRETARY OF THE NAVY, *et al.*,

Defendants

* * * * *

**MOTION TO COMPEL PRODUCTION OF NOVEMBER 7, 2006 AUDIOTAPES
OF MOTIONS HEARING**

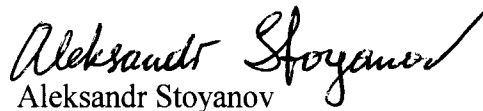
Plaintiffs Aleksandr Stoyanov and Yuri Stoyanov file this Motion to compel the Court Reporter to produce audiotapes of the November 7, 2006 motions hearing. Plaintiffs move to compel the Court Reporter to produce audiotapes of the November 7, 2006 motions hearing for the following cause:

After delays, the transcripts of the November 7, 2006 hearing were finally released to Plaintiffs by the court reporter Ms. L. Bankins. Plaintiffs were concerned with the long delays and had to call Ms. Bankins repeatedly to release the transcripts. Plaintiffs finally received the November 7, 2006 hearing transcripts on December 12, 2006, instead of ordered two weeks delivery. Upon review of the transcripts, Plaintiffs believed that the transcripts did not accurately reflect the November 7, 2006 hearings and to resolve the issue decided to order the audiotapes.

Also, Ms. Bankins did not certify the transcripts. On December 21, 2006, Plaintiff called the Court Reporter Ms. Lisa Bankins to discuss ordering of the audiotapes of the November 7, 2006 motions hearing. Ms. Bankins was unavailable, however returned the call early in January 2007 and informed Plaintiff that the audiotapes would not be made available to the Plaintiffs. Ms. Bankins informed Plaintiff that she could check the transcripts of the November 7, 2006 motions hearing by listening to the audiotape and asked Plaintiff to identify specific concerns related to the transcripts of the November 7, 2006 motions hearing. On January 3, 2007, Plaintiff identified to Ms. Bankins specific area in the transcripts of November 7, 2006 motions hearing (for example, at or around page 136) that Plaintiff felt did not reflect all statements Plaintiffs made. On January 5, 2006, Plaintiff also called Ms. Bankins to inquire about the audiotape of the November 7, 2006 motions hearing and Ms. Bankins again informed Plaintiff that the audiotape would not be released to the Plaintiffs. Thus, after Plaintiffs made good faith efforts to obtain the audiotapes of the November 7, 2006 motions hearing from the court reporter and because the court reporter failed to release the audiotape, Plaintiffs respectfully file this motion with the Court to issue order compelling Ms. Bankins to release the audiotapes of the November 7, 2006 hearing. Given that the release of the November 7, 2006 hearing transcripts was significantly delayed and the court reporter failed to release the audiotapes, Plaintiffs move to compel release of the audiotapes of the November 7, 2006 hearing to resolve the issue of verifying transcripts for accuracy and completeness.

Accordingly, Plaintiffs respectfully submit Motion to Compel the Court Reporter to release the audiotape of the November 7, 2006 motions hearing to the Plaintiffs.

Respectfully submitted



Aleksandr Stoyanov
7560 Pindell School Rd
Fulton, MD 20759
Phone/Fax (301) 604 - 7615

Certificate of Service

I hereby certify that on the 8th day of January 2007, a copy of the Plaintiff's **MOTION TO COMPEL PRODUCTION OF NOVEMBER 7, 2006 AUDIOTAPES OF MOTIONS HEARING** was sent to the following via:

Fax (410) 962-9947 or First Class Mail

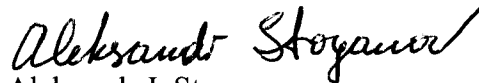
John W. Sippel, Jr.

Assistant United States Attorney

36 South Charles Street

Fourth Floor

Baltimore, Maryland 21201



Aleksandr J. Stoyanov
7560 Pindell School Road
Fulton, MD 20759